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 MICHELLE S. GRIMBERG (CA SBN No. 217327)  
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 & BRILL L.L.P.  
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Proposed Attorneys for Defendant  
 Selim America, Inc.

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X  
 HWASEUNG NETWORKS AMERICA, CORP. 10 CIV 6328

Plaintiff.

- against -

NOTICE OF FILING OF PETITION  
 FOR RELIEF UNDER CHAPTER 11  
 OF THE UNITED STATES  
 BANKRUPTCY CODE, 11 U.S.C. §  
 101, ET. SEQ., AND IMPOSITION OF  
 AUTOMATIC STAY

SELIM TEXTILE, INC., a New York Corporation;  
 SELIM AMERICA, INC., a New York  
 Corporation; JUNE YONG KIM; KEON HO LEE;  
 KEYSTONE TEXTILES, INC. a California  
 Corporation; GLOBIZ CLOTHING USA, INC., a  
 California Corporation; ABC COMPANIES  
 (fictitious names of corporate affiliates of defendants  
 Selim Textiles, Inc., Selim America Inc., Keystone  
 Textiles, Inc., and Globiz Clothing USA, Inc. whose  
 identities are presently unknown); XYZ  
 COMPANIES 1 through 50, inclusive, (fictitious  
 names of companies in which defendants June Yong  
 Kim and Keon Ho Lee has an interest, whose  
 identities are presently unknown); JANE and JOHN  
 DOES 1 through 50, inclusive (fictitious individuals  
 affiliated with the named defendants),

Defendant(s).

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1       **PLEASE TAKE NOTICE** that, on August 23, 2010, a petition under Chapter 11 of  
2 Title 11, United States Code, 11 U.S.C. § 101, et seq. (the “Bankruptcy Code”) was filed by  
3 SELIM AMERICA, INC. (the “Debtor”), in the United States Bankruptcy Court for the  
4 Central District of California, Los Angeles Division, bearing case number 2:10-bk-45503-  
5 RN.

6       A true and correct copy of the face page of the petition filed by the Debtor is attached  
7 hereto as **Exhibit “A”** and is incorporated herein by this reference.

8       The Debtor’s bankruptcy case has been assigned to the Honorable Richard Neiter,  
9 United States Bankruptcy Judge. Your attention is directed to Bankruptcy Code § 362, which  
10 provides for an automatic stay against:

11       (1)     the commencement or continuation, including the issuance or employment of  
12 process, of a judicial, administrative, or other action or proceeding against the Debtor that  
13 was or could have been commenced before the commencement of the cases under Title 11; or  
14 to recover a claim against the Debtor that arose before the commencement of the case under  
15 the Bankruptcy Code;

16       (2)     the enforcement, against the Debtor or against property of the Debtor’s estate,  
17 of a judgment obtained before the commencement of the cases under the Bankruptcy Code;

18       (3)     any act to obtain possession of property of the Debtor’s estate or of property  
19 from the estate, or to exercise dominion or control over property of the estate;

20       (4)     any act to create, perfect, or enforce any lien against property of the estate;

21       (5)     any act to create, perfect, or enforce against property of the Debtor any lien to  
22 the extent that such lien secures a claim that arose before the commencement of the case  
23 under Title 11;

24       (6)     any act to collect, assess, or recover a claim against the Debtor that arose  
25 before the commencement of the case under Title 11;

26       (7)     the setoff of any debt owing to the Debtor that arose before the  
27 commencement of the case under Title 11 against any claim against the Debtor; and  
28

(8) the commencement or continuation of a proceeding before the United States Tax Court concerning the Debtor.

The automatic injunction granted by Bankruptcy Code § 362(a) will remain in effect until the bankruptcy case is dismissed or closed or until such earlier time as set forth in Bankruptcy Code §§ 362(c), (d), (e) and (f).

In addition, please note that actions taken in violation of the stay are void *ab initio* and of no effect. *See In re Dunbar*, 245 F.3d 1058 (9th Cir. 2001).

Levene, Neale, Bender, Yoo & Brill L.L.P. is the counsel of record in the bankruptcy case, and is filing this Notice solely for information purposes only. The filing of this Notice is not to be construed or deemed to be an appearance by Levene, Neale, Bender, Yoo & Brill L.L.P. as counsel of record for any party to the instant action.

**NOTICE IS HEREBY GIVEN** that contempt proceedings may be initiated against any party who participates in any violation of the automatic stay. In addition, the Bankruptcy Court may award damages to compensate the Debtor for actual loss suffered arising out of a violation of the automatic stay. *See In re Computer Communications, Inc.*, 824 F.2d 725, 731 (9th Cir. 1987).

Dated: August 25, 2010

SELIM AMERICA, INC.

By: /s/ Michelle S. Grimberg  
TIMOTHY J. YOO  
(CA SBN 155531)  
MONICA Y. KIM  
(CA SBN 180139)  
MICHELLE S. GRIMBERG  
(CA SBN 217327)  
LINDSEY L. SMITH  
(CA SBN 265401)  
LEVENE, NEALE, BENDER, YOO  
& BRILL L.L.P.

Proposed Attorneys for Defendant, Selim America, Inc., Debtor and Debtor in Possession

# **EXHIBIT A**

B1 (Official Form 1)(4/10)

<b>United States Bankruptcy Court Central District of California</b>				<b>Voluntary Petition</b>	
Name of Debtor (if individual, enter Last, First, Middle): <b>SELIM AMERICA, INC., a New York corporation</b>			Name of Joint Debtor (Spouse) (Last, First, Middle):		
All Other Names used by the Debtor in the last 8 years (include married, maiden, and trade names):			All Other Names used by the Joint Debtor in the last 8 years (include married, maiden, and trade names):		
Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all) <b>26-1353077</b>			Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all)		
Street Address of Debtor (No. and Street, City, and State): <b>725 S. Figueroa Street, Suite 3070 Los Angeles, CA</b> <div style="text-align: right;">ZIP Code <b>90017</b></div>			Street Address of Joint Debtor (No. and Street, City, and State): <div style="text-align: right;">ZIP Code</div>		
County of Residence or of the Principal Place of Business: <b>Los Angeles</b>			County of Residence or of the Principal Place of Business:		
Mailing Address of Debtor (if different from street address): <div style="text-align: right;">ZIP Code</div>			Mailing Address of Joint Debtor (if different from street address): <div style="text-align: right;">ZIP Code</div>		
Location of Principal Assets of Business Debtor (if different from street address above):					
<b>Type of Debtor</b> (Form of Organization) (Check one box)  <input type="checkbox"/> Individual (includes Joint Debtors) <i>See Exhibit D on page 2 of this form.</i> <input checked="" type="checkbox"/> Corporation (includes LLC and LLP) <input type="checkbox"/> Partnership <input type="checkbox"/> Other (If debtor is not one of the above entities, check this box and state type of entity below.)		<b>Nature of Business</b> (Check one box)  <input type="checkbox"/> Health Care Business <input type="checkbox"/> Single Asset Real Estate as defined in 11 U.S.C. § 101 (51B) <input type="checkbox"/> Railroad <input type="checkbox"/> Stockbroker <input type="checkbox"/> Commodity Broker <input type="checkbox"/> Clearing Bank <input checked="" type="checkbox"/> Other  <b>Tax-Exempt Entity</b> (Check box, if applicable) <input type="checkbox"/> Debtor is a tax-exempt organization under Title 26 of the United States Code (the Internal Revenue Code).		<b>Chapter of Bankruptcy Code Under Which the Petition is Filed</b> (Check one box)  <input type="checkbox"/> Chapter 7 <input type="checkbox"/> Chapter 9 <input checked="" type="checkbox"/> Chapter 11 <input type="checkbox"/> Chapter 12 <input type="checkbox"/> Chapter 13  <input type="checkbox"/> Chapter 15 Petition for Recognition of a Foreign Main Proceeding <input type="checkbox"/> Chapter 15 Petition for Recognition of a Foreign Nonmain Proceeding  <b>Nature of Debts</b> (Check one box)  <input type="checkbox"/> Debts are primarily consumer debts, defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose." <input checked="" type="checkbox"/> Debts are primarily business debts.	
<b>Filing Fee</b> (Check one box)  <input checked="" type="checkbox"/> Full Filing Fee attached  <input type="checkbox"/> Filing Fee to be paid in installments (applicable to individuals only). Must attach signed application for the court's consideration certifying that the debtor is unable to pay fee except in installments. Rule 1006(b). See Official Form 3A.  <input type="checkbox"/> Filing Fee waiver requested (applicable to chapter 7 individuals only). Must attach signed application for the court's consideration. See Official Form 3B.			<b>Chapter 11 Debtors</b> Check one box: <input type="checkbox"/> Debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). <input checked="" type="checkbox"/> Debtor is not a small business debtor as defined in 11 U.S.C. § 101(51D). Check if: <input type="checkbox"/> Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,343,300 ( <i>amount subject to adjustment on 4/01/13 and every three years thereafter</i> ). Check all applicable boxes: <input type="checkbox"/> A plan is being filed with this petition. <input type="checkbox"/> Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).		
<b>Statistical/Administrative Information</b> <input checked="" type="checkbox"/> Debtor estimates that funds will be available for distribution to unsecured creditors. <input type="checkbox"/> Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.				THIS SPACE IS FOR COURT USE ONLY	
<b>Estimated Number of Creditors</b> <div style="display: flex; justify-content: space-between;"> <span><input checked="" type="checkbox"/> 1-49</span> <span><input type="checkbox"/> 50-99</span> <span><input type="checkbox"/> 100-199</span> <span><input type="checkbox"/> 200-999</span> <span><input type="checkbox"/> 1,000-5,000</span> <span><input type="checkbox"/> 5,001-10,000</span> <span><input type="checkbox"/> 10,001-25,000</span> <span><input type="checkbox"/> 25,001-50,000</span> <span><input type="checkbox"/> 50,001-100,000</span> <span><input type="checkbox"/> OVER 100,000</span> </div>					
<b>Estimated Assets</b> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> \$0 to \$50,000</span> <span><input type="checkbox"/> \$50,001 to \$100,000</span> <span><input type="checkbox"/> \$100,001 to \$500,000</span> <span><input type="checkbox"/> \$500,001 to \$1 million</span> <span><input type="checkbox"/> \$1,000,001 to \$10 million</span> <span><input checked="" type="checkbox"/> \$10,000,001 to \$50 million</span> <span><input type="checkbox"/> \$50,000,001 to \$100 million</span> <span><input type="checkbox"/> \$100,000,001 to \$500 million</span> <span><input type="checkbox"/> \$500,000,001 to \$1 billion</span> <span><input type="checkbox"/> More than \$1 billion</span> </div>					
<b>Estimated Liabilities</b> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> \$0 to \$50,000</span> <span><input type="checkbox"/> \$50,001 to \$100,000</span> <span><input type="checkbox"/> \$100,001 to \$500,000</span> <span><input type="checkbox"/> \$500,001 to \$1 million</span> <span><input type="checkbox"/> \$1,000,001 to \$10 million</span> <span><input type="checkbox"/> \$10,000,001 to \$50 million</span> <span><input checked="" type="checkbox"/> \$50,000,001 to \$100 million</span> <span><input type="checkbox"/> \$100,000,001 to \$500 million</span> <span><input type="checkbox"/> \$500,000,001 to \$1 billion</span> <span><input type="checkbox"/> More than \$1 billion</span> </div>					

HWASEUNG NETWORKS AMERICA, CORP  
vs. SELIM TEXTILE, INC., SELIM AMERICA, INC. ET AL.

CASE NO 10-CV-6328

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Blvd., Ste. 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document described as **NOTICE OF FILING OF PETITION FOR RELIEF UNDER CHAPTER 11 OF THE UNITED STATES BANKRUPTCY CODE, 11 U.S.C. § 101, ET. SEQ., AND IMPOSITION OF AUTOMATIC STAY** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **August 25, 2010** I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Counsel for Plaintiff Hwaseung Networks America, Corp.

Matthew Joon Jeon

Matthew Jeon, P.C.

401 Broadway Ave.

Suite 1004

New York, NY 10013

mjeonlaw@yahoo.com

☐ Service information continued on attached page

II. **SERVED BY U.S. MAIL OR OVERNIGHT MAIL**(indicate method for each person or entity served):

On **August 25, 2010** I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None.

☐ Service information continued on attached page

III. **SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **August 25, 2010** I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

### **VIA FEDEX DELIVERY**

Hon. Jed S. Rakoff

United States Courthouse

500 Pearl St., Courtroom: 14B

New York, NY 10007-1312

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

**August 25, 2010**

Angela Antonio

/s/ Angela Antonio

Date

Type Name

Signature